Joint Written Statement of the

National Petrochemical & Refiners Association National Marine Manufacturers Association Outdoor Power Equipment Institute

Delivered by

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Before the

United States Senate Environment and Public Works Committee, Subcommittee on Clean Air and Nuclear Safety

Concerning

"Implementation of the Renewable Fuel Standard and Mid-Level Ethanol Blends"

April 1, 2009

Washington, DC

I. Introduction

Good morning, Chairman Carper, Ranking Member Vitter, and members of the Subcommittee. My name is Charlie Drevna. I am President of the National Petrochemical and Refiners Association (NPRA). I appear here today representing the interests not just of NPRA's members, but also the National Marine Manufacturers Association (NMMA), and the Outdoor Power Equipment Institute (OPEI). I appreciate the opportunity to testify at this hearing today.

NPRA is a national trade association with more than 450 members, including those who own or operate virtually all U.S. refining capacity, as well as most of the nation's petrochemical manufacturers who supply "building block" chemicals necessary to produce products ranging from pharmaceuticals to fertilizer to Kevlar.

NMMA is the leading national recreational marine trade association, with nearly 1,700 members involved in every aspect of the boating industry. NMMA members manufacture over 80 percent of the recreational boats, engines, trailers, accessories and gear used by boaters and anglers in the United States.

OPEI is the major international trade association representing the \$15 billon forestry, utility, landscape and lawn & garden equipment manufacturing industry. OPEI is a recognized Standards Development Organization for the American National Standards Institute (ANSI) and active internationally through the International Standards Organization (ISO) in the development of safety standards.

Our associations have one fundamental joint message for the Subcommittee today: ethanol should not be blended into gasoline at levels higher than 10 percent for use in non-flexible fuel motor vehicles and nonroad gasoline-powered engines until comprehensive and independent testing shows that higher ethanol blends – so-called "mid-level ethanol blends" – are safe for consumers and

do not harm the environment or public health. Our joint message should not be characterized as "anti-ethanol." Our organizations are not opposed to the prudent development and use of biofuels, including ethanol, to diversify our nation's transportation and nonroad fuels portfolio. However, before the use of mid-level ethanol blends is permitted, we must ensure that these blends are safe for consumers, do not harm gasoline-powered engines, and do not lead to increases in emissions from these engines that will harm the environment.

We collectively are opposed to any legislative or regulatory action to approve the introduction of mid-level ethanol blends until unbiased and comprehensive testing of the safety, operational and environmental effects of these fuels has been completed. Until that date, which will not happen in a matter of months, we urge you to join us in opposing the introduction of mid-level blends into the marketplace.

We are not alone in our concern that science be placed above politics with respect to midlevel ethanol blends. Attached to my testimony is a recent letter to senior officials in the Obama Administration signed by over fifty national, state and local business, environmental, public health and agricultural associations and companies that echoes the same sentiment: comprehensive and independent testing of mid-level ethanol blends much be completed before these fuels are allowed into commerce.

Currently, the maximum level of ethanol that may be blended into gasoline for use in conventional gasoline-powered engines is 10 percent by volume (referred to as "E10"). Some advocate "breaching the blendwall" – as the E10 cap is characterized – through an administrative action by the Environmental Protection Agency or through legislative fiat. We urge this Committee, this Congress, and the Obama Administration to adhere to President Obama's words when he stated that science, not politics, would guide his Administration's approach to the difficult public policy

issues we face today. To quote from President Obama's March 9, 2009 Memorandum on "Scientific Integrity":

"Science and the scientific process must inform and guide decisions of my Administration on a wide range of issues, including improvement of public health, protection of the environment, increased efficiency in the use of energy and other resources, mitigation of the threat of climate change, and protection of national security."

To understand our associations' position on this issue, it is helpful to have some background on the 2007 renewable fuel standard ("RFS") and the upcoming "ethanol blendwall" that we face in the next 24 to 36 months.

II. Background on Revised Renewable Fuel Standard

A. "Energy Independence and Security Act of 2007" and the RFS2

President Bush signed the "Energy Independence and Security Act of 2007" ("EISA") (Public Law 110-140) on December 19, 2007. Among its many provisions, EISA increased the volume of renewable fuels mandated through the existing RFS (adopted under the "Energy Policy Act of 2005") starting in 2008, increasing these volumes to 36 billion gallons in 2022.

The RFS, as revised under EISA (and referred to here as RFS2 to distinguish it from the first RFS adopted in 2005) requires annually increasing volumes of renewable fuels to be blended into transportation fuels (gasoline and highway/nonroad diesel¹). The 2005 RFS was tied to gasoline only. The RFS2 expands the scope to include renewable fuels used to replace or reduce the quantity of fossil fuel in home heating oil or jet fuel.²

The RFS2 also created a complicated mix of submandates for specific classes of renewable fuels:

¹ Including nonroad vehicles and engines except for ocean-going vessels.

² By comparison, EPAct05 restricted RFS1 'renewable fuel' to replace or reduce the quantity of fossil fuel used to operate a motor vehicle. See CAA section 211(o)(1)(C)(i).

- Conventional Biofuels Under the RFS2, there is no direct submandate for conventional biofuels, which generally is defined as ethanol derived from corn starch. However, there is an implicit corn ethanol mandate under the RFS2 which rises from 10.5 billion gallons in 2009 to 15 billion gallons in 2015. In addition, under the RFS2, conventional biofuels must reduce direct and indirect lifecycle greenhouse gas ("GHG") emissions at least 20 percent from the 2005 transportation fuel baseline if the renewable fuel manufacturing facility commences construction after the date of enactment (the "grandfather" provision).
- Advanced Biofuels Under the RFS2, "advanced biofuels" exclude biofuels derived from corn starch and, if not grandfathered, must reduce direct and indirect lifecycle GHG emissions by at least 50 percent from the 2005 transportation fuel baseline. advanced biofuels mandate has three submandates: cellulosic biofuel; biomass-based diesel; and, "other."
 - o Cellulosic biofuels requirements are a subset of the advanced biofuels submandate and must reduce direct and indirect lifecycle GHG emissions, if not grandfathered, by at least 60 percent from the 2005 transportation fuel baseline. Cellulosic biofuels must be derived from any cellulose, hemicellulose, or lignin from renewable biomass.³
 - Biomass-based diesel is another subset of advanced biofuels and, if not grandfathered, must reduce direct and indirect lifecycle GHG emissions by at least 50 percent from the 2005 transportation fuel baseline. Biomass-based diesel is defined under section 312(f) of the Energy Policy Act of 1992.⁴ The regulatory values for biomass-based diesel after 2012 will be determined by EPA, in consultation with DOE and USDA, and promulgated no later than 14 months before the first year for which the new volume applies.
 - "Other" advanced biofuels has regulatory significance because the statutory sum of cellulosic biofuels and biomass-based diesel does not equal the total volume requirement of advanced biofuels. The "other" advanced biofuels subset can be met with ethanol derived from sugar or additional cellulosic biofuels or biomassbased diesel.

The table on the next page graphically portrays the nested nature and statutory annual volumes of these new RFS2 requirements.

(1) the term 'biodiesel' means a diesel fuel substitute produced from nonpetroleum renewable

Renewable biomass is restricted to exclude planted crops and crop residue from agricultural land cleared after December 19, 2007, and planted trees and tree residue from federal land.

⁴ Section 312(f): "For the purpose of this section - -

resources that meets the registration requirements for fuels and fuel additives established by the Environmental Protection Agency under section 7545 of this title [Section 211 of the Clean Air Act, Regulation of Fuels];"

RFS2 (billion gallons)

			Total	Total
			Total	Total
	Biomass-based	Cellulosic	Advanced	Renewable
	Diesel	Biofuel	Biofuel	Fuel
2007				4.70
2008				9.00
2009	0.50		0.60	11.10
2010	0.65	0.10	0.95	12.95
2011	0.80	0.25	1.35	13.95
2012	1.00	0.50	2.00	15.20
2013	TBD	1.00	2.75	16.55
2014	TBD	1.75	3.75	18.15
2015	TBD	3.00	5.50	20.50
2016	TBD	4.25	7.25	22.25
2017	TBD	5.50	9.00	24.00
2018	TBD	7.00	11.00	26.00
2019	TBD	8.50	13.00	28.00
2020	TBD	10.50	15.00	30.00
2021	TBD	13.50	18.00	33.00
2022	TBD	16.00	21.00	36.00

B. EPA Has Not Yet Promulgated Regulations to Implement the RFS2

EPA has not yet proposed implementing regulations for the advanced biofuels statutory requirement for 2009, the greenhouse gas reduction restrictions for new biofuel plants, or the expansion of the scope under the RFS2 to include renewable fuel used to replace or reduce the quantity of fossil fuel in home heating oil or jet fuel. As a result, these aspects of the RFS2 program will not be effective in 2009.

However, the implicit conventional biofuels, or corn ethanol, submandate under the RFS2 does not require regulatory implementation and was effective upon enactment of EISA. EPA has implemented an 11.1 billion gallon RFS2 conventional biofuels requirement for 2009 using the original RFS regulatory framework.

III. What Is The "Blendwall"?

To understand the issues associated with the "blendwall," it is necessary to examine the Clean Air Act procedures through which fuels and fuel additives are introduced into commerce in the United States.

A. Clean Air Act Restrictions on Introducing New Fuels and Fuel Additives

In 1977, Congress enacted Section 211(f) of the Clean Air Act (42 U.S.C. 7545(f)), which generally requires that any fuel or additive introduced into commerce – including gasoline additives such as ethanol or gasoline blended with different levels of ethanol – be "substantially similar" (commonly referred to as "sib sim") to fuels used to certify vehicle and engines to their respective emission standards. This so-called "sub sim" restriction was put in place by Congress to ensure that new fuels or fuel additives would not interfere with or render inoperative the air pollution control devices that were being installed on motor vehicles in the 1970s.

Section 211(f)(4) provides a fuel or fuel additive manufacturer with an opportunity to seek a waiver of the general "sub sim" prohibition from EPA if the manufacturer can prove to EPA that its fuel or additive will not harm emissions control devices on motor vehicles and other internal combustion engines regulated under the Clean Air Act. Prior to the enactment of EISA, such a 211(f)(4) waiver could be deemed granted by EPA if the Agency did not act on a manufacturer's "sub sim" petition within 180 days. It was under this pre-EISA "deemed granted" provision that E10 was "approved" by EPA in the 1980s. In other words, EPA never issued a formal determination that E10 was "sub sim" or that it would not harm vehicles' emissions control devices. Instead, EPA allowed the E10 petition's 180 day review period to expire without taking formal action, thereby permitting the introduction of E10 into the marketplace.

Congress amended Section 211(f)(4) through Section 251 of EISA in 2007 in several ways. First, the "deemed granted" feature of the pre-EISA 211(f)(4) waiver process was discarded in favor of a final Agency action approving or denying a manufacturer's petition within 270 days of the receipt of a petition – an action that could then be reviewed judicially. Second, EISA provided that EPA must give the public notice and the opportunity to comment on any "sub sim" petition during the 270 day period. Third, EISA clarified that Section 211(f)(4) applied not only to motor vehicle engines but to all onroad and nonroad engines. With respect to ethanol, that means that a manufacturer of ethanol seeking a "sub sim" waiver for a mid-level ethanol blend must prove that such a blend is not harmful to the emissions control systems of both motor vehicles and nonroad mobile and stationary engines such as motorcycles, generators, lawn mowers, chain saws, and marine engines.

B. Current EPA Limits on Ethanol Blending into Gasoline

The current EPA limit for blends of ethanol with gasoline for use in conventional gasoline engines is E10. Blends in excess of E10 (such as E85) are classified by EPA as alternative fuels, not

gasoline, and may only be used in alternative fuel vehicles, such as those with flexible fuel designs. Thus, under the Clean Air Act and EPA "sub sim" regulations, it is unlawful for mid-level ethanol blends, such as E12, E13, E15 or E20 to be sold in the United States for use in conventional motor vehicles or non-road engines.

C. Gasoline-Powered Engine Engineering and Mid-Level Ethanol Blends

The E10 limit has been in place for almost 20 years and is the maximum ethanol content standard to which all gasoline-powered engine manufacturers have engineered their conventional motor vehicle and nonroad engines for the past two decades. Currently, there are over 240 million motor vehicles and 400 million non-vehicle gasoline engines in use by hundreds of millions of American consumers. These motor vehicles and nonroad engines are not designed to operate on mid-level ethanol blends.

That is not to say that motor vehicle and nonroad engines cannot be engineered to run on mid-level ethanol blends in the future. Clearly, flexible fuel vehicle technology proves that motor vehicles can be designed to run on any ethanol level, including as high as E85. However, flexible fuel vehicles currently make up less than five percent of the motor vehicle fleet in the United States. Even if all new vehicles were designed with this capability starting today, it would take decades for the fleet to turn over, and some classes would remain, such as antique vehicles, that could not use ethanol blends. Similarly, nonroad engines can be engineered to run on E20, but none of the hundreds of millions of nonroad engines currently owned by consumers have been engineered to run on an ethanol blend higher than E10.

D. Ethanol Penetration in the U.S. Gasoline Pool and the "Blendwall"

Ethanol currently is blended into about 75 – 80 percent of every gallon of gasoline sold in the United States, generally at a blend rate of 10 percent (although some gallons do contain ethanol

blends of 5.7 and 7.7 percent due to blending, tax, or environmental restrictions in some areas of the country).

The U.S. Department of Energy's Energy Information Administration ("EIA") reports that gasoline consumption in the United States was 139 billion gallons in 2007 and 135 billion gallons in 2008. If all U.S. gasoline contained ethanol at the E10 cap today, then 13-14 billion gallons would be the maximum level of ethanol that could be used in gasoline in the United States. This is the so-called "blendwall." As the implicit conventional biofuels (corn ethanol) submandate of the RFS2 program rises above the level of E10 saturation, the remaining mandate for that year must be met either through use of ethanol in E85 or through biomass-based diesel.

If gasoline demand in the United States declines in 2009 at the same rate it did in 2008, then our country could reach the E10 saturation point as soon as 2011. Indeed, EIA forecasts predict that 2009 gasoline demand will have declined a total of 10 percent from 2007 demand.⁵ At that point, unless the use of mid-level ethanol blends is approved for use in non-flexible fuel engines, all additional corn ethanol production would be forced into the E85 marketplace, although demand for E85 remains relatively small due to the proportionately small number of flexible fuel vehicles compared to conventional vehicles.

IV. The Need for Comprehensive Research on Mid-Level Ethanol Blends and Conventional Gasoline-Powered Engines

There has been no comprehensive research conducted on the potential safety, public health, engine operation, or increased emission impacts from the use of mid-level ethanol blends in conventional gasoline-powered engines. The data that does exist can be summarized as follows:

• Past durability studies from earlier this decade indicate that mid-level ethanol blends result in increased emissions from, and emissions control device failures in, motor

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⁵ EIA. "Short Term Energy Outlook." March 10, 2009; http://www.eia.doe.gov/emeu/steo/pub/contents.html.

- vehicle engines over their useful life and result in safety degradation and performance deficiencies with other gasoline-powered engines;
- More recent data developed and promoted by the ethanol industry on very small numbers
 of vehicles fueled with mid-level blends for short periods of time. The development of
 this data was not conducted under established federal test procedures and it has not been
 peer-reviewed; and,
- Screening, or preliminary tests conducted by DOE and the Coordinated Research Council ("CRC") ⁶ that indicate that emissions of some pollutants increase when conventional vehicles use mid-level ethanol blends and nonroad engines actually fail. Notably, 44% of the vehicles tested by DOE are vulnerable to catalyst deterioration during their useful life. (marine engines have not been tested at all by any federal agency, although some private studies reveal significant problems).

Independent observers have concluded that a great deal of additional testing must be completed before the use of mid-level ethanol blends is authorized by EPA. And many research projects on mid-level ethanol blends have been identified that would fill critical gaps in knowledge, especially regarding the durability of vehicles and their emission control systems. The attached chart provides an overview of the needed vehicle studies, some of which are completed and some of which still require funding, with associated timelines. The research program would provide basic but comprehensive testing on such issues as durability (catalysts, evaporative systems, and fuel systems), tailpipe emissions, driveability, materials compatibility, and on-board diagnostics. We anticipate they can be completed in about two more years, assuming they are all fully funded and move forward on a reasonable schedule.

Separate and apart from vehicle testing, there has been virtually no testing on mid-level ethanol blends on nonroad gasoline engines. Our associations are deeply concerned with the potential impacts on these engines, which consist of: (1) higher exhaust gas temperatures and attendant operational and safety risks; (2) possible irreversible damage to engines; (3) loss of

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⁶ CRC is a non-profit organization that directs research on the interaction between automotive/other mobility equipment and petroleum products. The Sustaining Members of CRC are the American Petroleum Institute, the Society of Automotive Engineers and a group of automobile manufacturers (Chrysler, Ford, General Motors, Honda, Mitsubishi, Nissan, Toyota, and Volkswagen). See www.crcao.com

durability; (4) materials compatibility; (5) emissions increases; (6) damages to manufacturers' reputations; and, (7) warranty validity. Further, nonroad engines generally utilize open loop air-fuel control systems which cannot compensate for changes in the oxygen content caused by mid-level ethanol blends. Additional research is necessary on a variety of engines⁷ and applications with different load cycles and cooling designs and operation speeds⁸ (including durability testing) and this has not yet begun.

Nonroad engines comprise over some 900 engine "families" currently regulated and certified for emissions by EPA. Of these 900 engine families, DOE recently tested 28 pieces of equipment to determine how mid-level ethanol blends may impact these engines. OPEI's analysis of the technical data reveals most of these engines experienced performance irregularities, operational issues, damage and/or failure during testing using mid-level ethanol blended fuel.

One finding of the DOE tests on nonroad engines is of extreme concern to OPEI -- safety hazards dramatically increased due to unintentional clutch engagement caused by high idle speeds. This means that blades engage in the idle position. The risks to a chainsaw user in this example are profound and unacceptable. Chainsaws are used by nearly every fire house, utility crew and emergency weather crew as well as commercial foresters and consumers. Their reliability and safe performance are critical to their users. Another example of genuine concern is the possible failure of emergency generators in a crisis. Again, their reliability and safe performance is critical to users. The potential use of mid-level ethanol fuels is a highly complex issue as related to outdoor power

⁷ 2-stroke, 2-stroke with catalyst, stratified scavenging, compression wave injection, 2-stroke/4-stroke hybrid, 4-stroke, and stratified with catalyst.

Professional backpack blowers, homeowner handheld blowers, professional chainsaw (heavy use), armer chainsaw (moderate use), homeowner chainsaw (light use), professional trimmer/brush cutter, farmer trimmer/brush cutter, homeowner trimmer, professional hedge trimmer, and consumer hedge trimmer.

equipment and its users and it cannot be rushed by efforts that overlook the impacts on consumer safety and their economic interests.

Marine engines manufactured by NMMA's members and others face many unique challenges and none have been addressed yet in any research programs on mid-level ethanol blends. Ethanol may degrade fiberglass and aluminum fuel tank material with resulting leaks and build-up of resin on valves, rods and stems, and can clog fuel systems. An ethanol blend may experience phase separation when the boat is stored for a long period. Phase separation attracts water, which can damage engines and cause metallic fuel tanks to leak. Marine engine manufacturers are concerned about increases in engine temperatures causing increased NOx emissions and stress on other components such as valves, head gaskets and head bolts, increased permeation and diurnal emissions, vapor lock, as well as a broad range of performance and durability issues.

V. EPA Has Received a Mid-level Ethanol Blend Waiver Request and Should Deny It

On March 6, 2009, Growth Energy LLC announced that it, joined by some ethanol manufacturers and other trade associations, had submitted a petition to EPA pursuant to Section 211(f)(4) for approval of E15. It is anticipated that EPA will announce soon the public comment period and the public hearing as required by Section 211(f)(4).

Our associations will urge EPA to deny this petition in our comments. Our collective position will be that EPA must deny this request because the science on the impact of mid-level ethanol blends on consumer safety, engine performance, and potential environmental harm has not been completed and likely will not be for at least two years. It would be premature for EPA to grant such a waiver and would in fact directly contradict the congressional intent expressed in EISA and now embodied in Section 211(f)(4).

In the same vein, our associations will oppose vigorously any legislative effort to bypass the Section 211(f)(4) approval process by directing EPA to permit the introduction of a mid-level ethanol blend. Congress should not subvert the 211(f)(4) process, ignore President Obama's directive to value science over politics, or put consumers, human health or the environment at risk by considering such a directive to EPA.

Similarly, our associations also will oppose strongly any attempt by Congress or EPA to sidestep the Section 211(f)(4) process by permitting the introduction of E12 or E13 into commerce. Ethanol proponents have argued that such a small adjustment in the E10 cap is not significant and should be authorized outside of the standard Section 211(f)(4) process. The fact is that they don't know whether this argument is true or not. Our associations assert that Congress and EPA have a duty to put consumer safety, public health and the environment first when considering mid-level ethanol blends – not the unsubstantiated and self-interested assertions of the ethanol industry.

VI. <u>Liability for Harm Caused by Mid-Level Ethanol Blends</u>

Growth Energy's petition to EPA for the approval – through the Section 211(f)(4) process or through an administrative shortcut – of mid-level ethanol blends concludes that sufficient testing has been done on motor vehicle, nonroad and marine engines to determine that these higher blends pose no risk to the environment, to public health, or to consumer safety. Our associations strongly disagree with this conclusion.

Motor vehicle and engine manufacturers and fuel providers carry considerable legal liability for any risks to consumers and for non-compliance with regulations. In addition, introducing higher blends into the marketplace would confuse consumers, with more than 600 million owner manuals of motor vehicles and nonroad engines advising consumers to avoid using gasoline that contains more than E10. There are questions of who will bear the liability for warranty claims and recalls,

and how to prevent harm to company reputations. Finally, if problems emerge, there is the possibility of consumer backlash against ethanol, which would have a damaging impact on public support for the use of ethanol as a transportation fuel. These challenges must be addressed in advance of any introduction of mid-level ethanol blends.

VII. Conclusion

There has not been sufficient testing of motor vehicle and nonroad equipment engines to justify a determination that any mid-level ethanol blend would meet the safety and environmental requirements of the time-tested Clean Air Act protections under Section 211(f). Some have asserted that preliminary or incomplete scoping studies suggest that mid-level ethanol blends may be compatible with some engines. However, other test results suggest that mid-level ethanol blends: (1) may be incompatible with some of today's volume of ethanol mandated through the motor vehicle and nonroad equipment engines; (2) may cause a failure of emission control devices or systems; (3) may defeat these engines' safety features; and (4) may lead to a significant increase in emissions from these engines over their useful life.

Our associations stand ready to work with Congress, the Administration and stakeholders to assure a stable and effective policy that will assist consumers and protect our environment. Consumer safety, public health, and environmental protection deserve robust and thorough testing before EPA allows mid-level ethanol blends for general sale in gasoline-powered engines – whether onroad or nonroad. Any decision on whether to permit the use of mid-level ethanol blends in motor vehicles and other equipment not designed for such use must be guided solely by sound, unbiased and comprehensive science and must be undertaken through an open, public and transparent process that takes into account both the increased air pollution that will result from the use of higher ethanol blends in many engines and the potential risks to consumers driving vehicles or handling engines fueled with these blends.

Thank you for the opportunity to testify at this hearing today. I would be pleased to answer any questions my testimony may have raised.

March 26, 2009

The Honorable Steven Chu Secretary of Energy U.S. Department of Energy Washington, D.C. 20585-1000 The Honorable Lisa Jackson Administrator U.S. Environmental Protection Agency Washington, D.C. 20460

The Honorable Tom Vilsack Secretary of Agriculture U.S. Department of Agriculture Washington, D.C. 20250 The Honorable Carol Browner Asst. to the President for Energy & Climate Change The White House Washington, D.C. 20500

Dear Secretaries Chu and Vilsack, Administrator Jackson and Mrs. Browner:

The undersigned diverse group of business, environmental, taxpayer, free-market and public health groups opposes any administrative or legislative efforts to increase the current cap on the amount of ethanol permitted to be blended into gasoline until independent and comprehensive testing has been completed that indicates that such mid-level ethanol blends (whether E12, E15 or E20) will not pose a risk to all gasoline-powered engines, to public health, to the environment and to consumers.

To quote from President Obama's March 9, 2009 Memorandum on "Scientific Integrity":

"Science and the scientific process must inform and guide decisions of my Administration on a wide range of issues, including improvement of public health, protection of the environment, increased efficiency in the use of energy and other resources, mitigation of the threat of climate change, and protection of national security."

Some have advocated that Congress or the Environmental Protection Agency ignore President Obama's Memorandum, avoid the safeguards built into Section 211(f) of the Clean Air Act (safeguards that were just strengthened by Congress in 2007), and approve mid-level ethanol blends before comprehensive testing programs on these blends have been completed by qualified and independent stakeholders, such as the Department of Energy and the Coordinating Research Council. We collectively, and strongly, oppose such an ill-considered approach as contrary to scientific integrity and potentially harmful to our environment, public health and consumers.

Sincerely,

Alliance for Worker Freedom

American Bakers Association

American Beverage Association

American Conservative Union

American Lung Association

American Meat Institute

American Sportfishing Association

Americans for Tax Reform

Americans for the Preservation of Liberty

Association of International Automobile Manufacturers

Association of Marina Industries

Boat Owners Association of the United States

Center for Auto Safety

Clean Air Task Force

Competitive Enterprise Institute

Council for Citizens Against Government Waste

Earthjustice

Engine Manufacturers Association

Environmental Working Group

Friends of the Earth

Grocery Manufacturers Association

Hispanic Alliance for Prosperity Institute

The Hispanic Institute

International Dairy Foods Association

International Snowmobile Manufacturers Association

National Center for Public Policy Research

National Chicken Council

National Council of Chain Restaurants

National Marine Manufacturers Association

National Petrochemical and Refiners Association

National Restaurant Association

National Taxpayers Union

National Turkey Federation

Natural Resources Defense Council

Outdoor Power Equipment Institute

Personal Watercraft Industry Association

Public Citizen

Sierra Club

Small Business & Entrepreneurship Council Snack Food Association Taxpayers for Common Sense

Alabama Poultry and Egg Association

California Poultry Federation

Georgia Poultry Federation

Indiana Poultry Federation

Iowa Turkey Federation

Minnesota Turkey Growers Association

Mississippi Poultry Association

North Carolina Poultry Federation

Poultry Federation of Arkansas, Oklahoma and Missouri

Virginia Poultry Association

Butterball, LLC

FarmEcon LLC.

Gold'n Plump Poultry

Pilgrim's Pride

Program Summary

Durability	Catalyst Durability Aging	CRC E-87 Ph-I	CRC E-87 Ph-II	
Testing (DT)	Evap Emissions Systems		0	CRC E-91
	Base Engine			CRC CM-136-09
	Fuel system, Damper, LM sen, Mat'l Compat.	AV	AVFL-15	AVFL-15 Follow-On
Tailpipe	Catalyst Durability Aging	CRC E-87 Ph-1	CRC E-87 Ph-II	
Festing (TP)	Powertrain Systems Cold Operation (MSAT NMHC &SULEV)	\$SULEV)		CRC E.XX
	Vehicle Emissions, Late Models	DOE VI	CRC E-87 Ph-II	
	Vehicle Emissions, Older Models	EPAct		
	Emissions - DOE will monitor	MN RFA E20 Study		
	Veh Perf & Emissions - DOT sponsored	RIT Study		
Evaporative Emissions (EV)	Evap Emissions, Permeation and Durability	CRC E-85 CRC E-77	0	CRC E-91
Driveability (DR)	Powertrain Systems Cold Operation (MSAT NMHC &SULEV)	xsulev)		CRC E.XX
	Vehicle Emissions, Late Models	DOE VI	CRC E-87 Ph-II	
	Driveability of 20 FFVs 6 non-FFVs	CRC CM-138		
	Driveability of 80 vehicles - DOE will monitor	MN RFA E20 Study		
	Veh Perf & Emissions - DOT sponsored	RIT Study		
Materials	Base Engine	(CRC CM-136-09
Compatibility (M)	Permeation of Fuel System		C	CRC E-91
	Fuel system, Damper, LM sen, Mat'l Compat.	AV AV	AVFL-15	AVFL-15 Follow-On
	Elastomer, Plastic & Metals - DOE will monitor	MN RFA E20 Study		
Emissions Inventory (EI)	Emissions/Air Quality Monitoring			E-68a Follow-on / A-73
080 (08)	On-Board Diagnostics		CR	CRC E-90
	Key:	Comprehensive		
Note: 2003 Australian Orbital Study	includes preliminary data for	Comprehensive in development		
catalyst durability, emissions tests	s tests & materials compatibility.	Preliminary, partial or screening		

CHRYSLER